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February 23, 2004

T.R.A. DOCKET ROOM

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VIA HAND DELIVERY

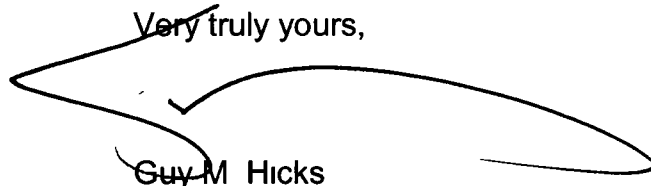
Hon. Deborah Taylor Tate, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Re: *Implementation of the Federal Communications Commission's
Triennial Review Order (Nine-month Proceeding)(Switching)*
Docket No. 03-00491

Dear Chairman Tate.

Enclosed are the original and fourteen copies of the revised Direct Testimony of Wayne Gray on behalf of BellSouth. The only revision is to the number of Co-Carrier Cross Connects ("CCXCs") in Tennessee. See line 3 of page 6 of the attached. Copies of the enclosed are being provided to counsel of record.

Very truly yours,



Guy M. Hicks

GMH ch

1 BELLSOUTH TELECOMMUNICATIONS, INC
2 **REVISED** DIRECT TESTIMONY OF A WAYNE GRAY
3 BEFORE THE TENNESSEE REGULATORY AUTHORITY
4 DOCKET NO 03-00491
5 JANUARY 16, 2004
6

7 Q PLEASE STATE YOUR NAME, YOUR POSITION WITH BELLSOUTH
8 TELECOMMUNICATIONS, INC ("BELLSOUTH") AND YOUR
9 BUSINESS ADDRESS
10

11 A My name is A Wayne Gray My business address is 675 West Peachtree
12 Street, Atlanta, Georgia 30375 My title is Director – Regional Planning and
13 Engineering Center in the Network Planning and support organization
14

15 Q. PLEASE PROVIDE A BRIEF DESCRIPTION OF YOUR BACKGROUND
16 AND EXPERIENCE
17

18 A I graduated from Georgia Tech in 1979, with a Bachelor of Electrical
19 Engineering degree In 1992, I received a Master of Business Administration
20 degree from Emory University I began working for Southern Bell in 1979, in
21 the Equipment Engineering organization in Miami, Florida. Over the course of
22 my 24-year career with BellSouth, I have held various line and staff positions
23 in Equipment Engineering, Traffic Engineering (Capacity Management),
24 Infrastructure Planning and Project Management In November 1999, I became
25 Director-Collocation in the Network Planning and Support organization In

1 December 2001, my scope of responsibility was expanded and my title was
2 changed to Director – Regional Planning and Engineering Center In this
3 position, I am responsible for ensuring that BellSouth provisions collocation
4 arrangements in the timeframes established by contractual agreements and
5 governmental mandates I am also responsible for managing the planning and
6 engineering of BellSouth's Advanced Intelligent Network, Common Channel
7 Signaling Network, Link Monitoring System, Public Packet Switching
8 Network, MemoryCall® Service platform, Pooled Internet Access Platforms,
9 and corporate transport network My responsibilities also include the activities
10 performed by BellSouth's Numbering and Technology Forecasting groups In
11 addition, I direct all switch software upgrades and contract administration for
12 the purchase of network technologies

13
14 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

15
16 A My testimony will address BellSouth's performance in the areas of availability
17 of collocation, provisioning of collocation, and availability of Co-carrier
18 Cross-Connects ("CCXCs"). BellSouth's performance is exemplary, as I will
19 prove by performance measurements and actual usage

20
21 Q PLEASE DISCUSS THE AVAILABILITY OF COLLOCATION SPACE IN
22 BELLSOUTH'S CENTRAL OFFICES

23
24 A. Space is available for Competitive Local Exchange Carriers ("CLECs") to
25 collocate equipment in all of BellSouth's Tennessee central offices If space

1 was not available, the CLEC would know by viewing the Space Exhaust List
2 located on the following BellSouth website
3 [http //interconnection bellsouth com/notifications/carrier/carrier_pdf/91081451](http://interconnection.bellsouth.com/notifications/carrier/carrier_pdf/91081451)
4 [-C.pdf](#)
5

6 Q ARE THERE ALTERNATIVES TO PHYSICAL COLLOCATION IN THE
7 CENTRAL OFFICE, ASSUMING RARE CIRCUMSTANCES WHERE
8 PHYSICAL COLLOCATION MAY NOT BE AVAILABLE IN THE
9 FUTURE?
10

11 A Yes CLECs may elect virtual collocation, or in the event that there is no
12 virtual collocation available in the central office, then the CLECs may request
13 adjacent collocation
14

15 Q IS BELL SOUTH PROVIDING PHYSICAL COLLOCATION TO CLECS
16 TODAY?
17

18 A. Yes. CLECs currently lease approximately 41,520 square feet of collocation
19 space within sixty (60) of BellSouth's Tennessee central offices
20

21 Q. DOES BELL SOUTH PROVIDE COLLOCATION SPACE TO CLECS IN A
22 TIMELY MANNER FOLLOWING CLECS' REQUESTS FOR SPACE?
23

24 A Yes As Mr Varner discusses in his testimony, over the past year, BellSouth
25 has achieved outstanding performance in meeting the collocation provisioning

1 intervals established by this Authority

2

3 Q ARE THERE MEASURES IN PLACE TO ASSURE THAT BELL SOUTH'S
4 LEVEL OF PERFORMANCE REGARDING COLLOCATION DOES NOT
5 DIMINISH?

6

7 A Yes This Authority has ordered Performance Measurements that are in place
8 today to monitor BellSouth's collocation performance, as Mr Varner explains
9 Should BellSouth fail to meet certain of these metrics, BellSouth would be
10 subject to penalty payments under the Self Effectuating Enforcement
11 Measurement ("SEEMs") Plan

12

13 Q. IS A CLEC'S ABILITY TO OBTAIN COLLOCATION A BARRIER TO
14 CLEC ENTRY IN BELL SOUTH'S MARKETS?

15

16 A Absolutely not

17

18 Q TURNING TO THE ISSUE OF CROSS-CONNECTS, WHAT IS A
19 "COMPETITIVE LEC-TO-COMPETITIVE LEC CROSS-CONNECT"?

20

21 A. A "Competitive LEC-to-Competitive LEC Cross-Connects" is commonly
22 referred to as a Co-Carrier Cross Connect ("CCXCs") A CCXC is a
23 connection between two CLECs' equipment and/or facilities located within the
24 same BellSouth premises A CCXC must be provisioned using cabling
25 facilities owned by the ordering carrier that is placed over BellSouth's

1 common cable support structure, unless the CLEC's equipment for facilities
2 are located in contiguous collocation arrangements within the central office
3 The CLECs must also contract with a BellSouth Certified Supplier to place the
4 cabling facilities for the provision of the CCXC

5
6 Q WHY WOULD TWO COLLOCATORS USE CO-CARRIER CROSS-
7 CONNECTS?

8
9 A There are a couple of potential uses A CLEC might use CCXCs to share
10 facilities and/or equipment or exchange interstate or interexchange traffic

11
12 Q DOES BELLSOUTH PERMIT CO-CARRIER CROSS-CONNECTS
13 TODAY?

14
15 A Yes, and BellSouth has done so for several years Today, a CLEC can connect
16 its collocation arrangement to another CLEC's collocation arrangement by
17 enlisting a certified installation vendor from the list of BellSouth Certified
18 Suppliers to place the cabling necessary to make the connections between the
19 two CLECs' arrangements Beginning sometime within the first quarter 2004,
20 BellSouth will provide another means for CLECs to obtain CCXCs BellSouth
21 will make CCXCs available pursuant to its FCC No 1 Tariff, whereby
22 BellSouth (rather than a third-party vendor) will provide a CCXC for both
23 CLECs at the collocation demarcation point

24
25 Q ARE THERE CLECS WHO HAVE CO-CARRIER CROSS-CONNECTS IN

1 SERVICE TODAY IN BELL SOUTH'S CENTRAL OFFICES?

2

3 A Yes. In Tennessee, there are approximately 5 CCXC arrangements in
4 BellSouth's central offices

5

6 Q. IS THE ABILITY OF CLECS TO OBTAIN CO-CARRIER CROSS-
7 CONNECTS IN BELL SOUTH CENTRAL OFFICES ON A TIMELY BASIS
8 A BARRIER TO CLEC ENTRY IN BELL SOUTH'S MARKETS?

9

10 A Absolutely not

11

12 Q. PLEASE SUMMARIZE YOUR TESTIMONY

13

14 A As my testimony demonstrates, CLECs are not impaired since collocation
15 space is available in all BellSouth central offices in Tennessee. Should space
16 become exhausted in a central office, other options are available to CLECs.
17 There are also multiple options available to CLECs to obtain CCXCs for the
18 purposes of connecting to other carriers' collocation spaces. BellSouth's
19 continued high level of performance is assured by the presence of SEEMs.
20 penalties should performance slip. For these reasons, a finding of impairment
21 is not warranted.

22

23 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

24

25 A Yes

CERTIFICATE OF SERVICE

I hereby certify that on February 23, 2004, a copy of the foregoing document was served on the parties of record, via the method indicated

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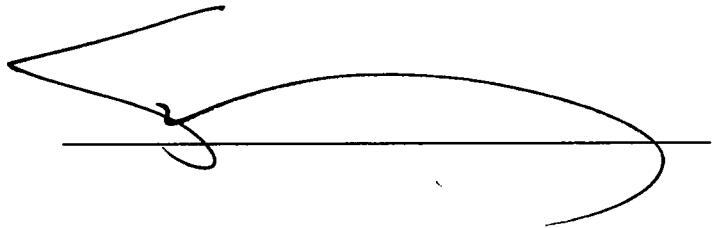
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A handwritten signature in black ink, appearing to be "Ken Woods", written over a horizontal line.